

Comment received through Missouri Department of Natural Resources e-mail system

Comments from Andrew Bracker
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In lieu of a more formal comment, this is a comment on the mercury soil Tier 1 level for indoor inhalation pathway. For all soil types, these levels are at or below many laboratory detection limits. It is my understanding that the previous level was 0.6 mg/kg under CALM. It is also my understanding that the February 2005 levels and proposed 2006 levels (unchanged) are based upon a formula and data assumptions borrowed from the Texas Natural Resources Conservation Commission. Among the assumptions made was a soil pH of 4.9, whereas the Texas standard offered variation based on different soil pH levels. In my opinion, the February 2005 mercury levels for indoor inhalation do not accurately reflect the actual risks for the majority of soil conditions found in Missouri. The mercury levels should be suspended and the CALM standard should be applicable for an interim period pending recalculation of new mercury levels for soils either incorporating a neutral pH soil value, or offering reasonable variation for actual soil pH conditions, without requiring the user to progress to Tier 2 analysis.